

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

19-CR-227-JLS

PETER GERACE, JR. and
JOSEPH BONGIOVANNI,

Defendants.

MOTION FOR DETERMINATION OF CONFLICT OF INTEREST

PLEASE TAKE NOTICE that, upon the attached affidavit, filed separately under seal, the undersigned moves this Court for an inquiry to determine whether a conflict of interest exists in the present representation of defendant Peter Gerace, Jr., by attorney Eric Soehnlein, and for such further relief as the Court may deem proper.

DATED: Buffalo, New York, March 13, 2023

TRINI E. ROSS
United States Attorney

BY: s/JOSEPH M. TRIPI
Assistant United States Attorney
United States Attorney's Office
Western District of New York
138 Delaware Avenue
Buffalo, New York 14202
716-843-5839
Joseph.Tripi@usdoj.gov